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May 3, 2023

IT IS HEREBY ORDERED that the Initial Pretrial Conference is adjourned to **August 1, 2023** at 11:00 a.m. The Court will refer this case to the assigned Magistrate Judge, Judge Willis, by separate order forthwith.

**SO ORDERED.**

Dated: May 3, 2023  
New York, New York

Hon. Jennifer L. Rochon  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1920  
New York, NY 10007

  
**JENNIFER L. ROCHON**  
United States District Judge

Re: Request for Early Settlement Conference and Adjournment of Initial Pretrial Conference  
*Tzur v. Henkel of America, Inc. et al.*  
Case No. 1:23-cv-02923-JLR

Dear Judge Rochon:

Pursuant to Local Civil Rule 83.9(f), plaintiff Mira Tzur and defendants Henkel of America, Inc., Henkel Corporation, and Henkel Consumer Goods Inc. respectfully request that the Court refer this matter for an early judicial settlement conference and adjourn the June 6, 2023 initial pretrial conference for six to eight weeks.

Plaintiff filed this lawsuit in the Supreme Court of the State of New York, County of New York, on December 2, 2022. On April 7, 2023, Henkel removed the case to federal court pursuant to 28 U.S.C. §§ 1441(b) and 1446.

Prior to removal, the parties agreed to participate in private mediation. In January of 2023, Plaintiff provided Henkel with initial documentation concerning her claim. The parties engaged in private mediation later that month.

Although the mediation was productive, the parties were unable to reach a resolution at that time. The parties would like to continue to try to resolve this case and believe that a judicial settlement conference before a United States Magistrate Judge may facilitate a resolution. Therefore, pursuant to Local Civil Rule 83.9(f), the parties respectfully request that the Court refer this matter to Hon. Sarah Netburn or Hon. Ona T. Wang for a judicial settlement conference.

The parties further request that the Court adjourn the June 6, 2023 initial pretrial conference in this matter for six to eight weeks to allow the parties to schedule and participate in the judicial settlement conference. There have been no previous requests for adjournment of the initial pretrial conference, and the requested adjournment does not affect any other scheduled dates.

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The parties propose the following alternative dates on which they are available for the initial pretrial conference: July 19, 2023, July 25, 2023, or August 1, 2023.

Thank you for your consideration of this request.

Respectfully submitted,

*/s/ Berj K. Parseghian*

Berj K. Parseghian of  
LEWIS BRISBOIS BISGAARD & SMITH LLP

Attorneys for Defendants  
Henkel of America, Inc., Henkel Corporation and  
Henkel Consumer Goods Inc.

cc: All counsel of record (by CM/ECF)